

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

FTX RECOVERY TRUST,

Plaintiff,

- against -

MANIFOLD MARKETS, INC, MANIFOLD  
FOR CHARITY, INC., ROSS RHEINGANS-  
YOO, and FTX PHILANTHROPY, INC.,

Defendant.

Adv. Pro. No. 24-50214 (KBO)

**CERTIFICATION OF COUNSEL**

I, Matthew B. McGuire, counsel to the FTX Recovery Trust (the “Plaintiff”), hereby certify as follows to the best of my knowledge, information and belief:

1. On June 29, 2023, Defendant Ross Rheingans-Yoo filed proof of claim number 5166 against Alameda Research Bahamas Ltd. (the “Claim”).

2. On October 30, 2023, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) filed an objection to the Claim (the “Objection”) [D.I. 3409].

3. On November 13, 2023, Defendant Rheingans-Yoo filed a response to the Objection [D.I. 3737].

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. On November 8, 2024, Plaintiff FTX Recovery Trust<sup>2</sup> (the “Plaintiff”) commenced the above-captioned adversary proceeding by filing its *Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 105, 544, 548 and 550 and Del. Code. Ann. Tit. 6, §§ 1304 and 1305* [Adv. D.I. 1] (the “Complaint”) against Defendant Manifold Markets, Inc. (“Manifold Markets”) in the United States Bankruptcy Court for the District of Delaware (the “Court”). Defendant Manifold Markets’ deadline to answer, move, or otherwise respond to the Complaint was extended through August 12, 2025.

5. On June 25, 2025, the Court held a hearing on the only remaining portion of the Claim relating to Defendant Rheingans-Yoo’s purported entitlement to recover \$650,000 in “directed grants” to an Effective Altruist charity (the “FDU Claim”).

6. On July 9, 2025, the Court entered the *Order Allowing Ross Rheingans-Yoo’s FDU Claim and Overruling the FTX Recovery Trust’s Objection to Ross Rheingans-Yoo’s FDU Claim* [D.I. 31312].

7. On July 23, 2025, Plaintiff filed its *Motion for Reconsideration or to Modify Order Allowing Rheingans-Yoo’s FDU Claim* [D.I. 31846] (the “Motion to Reconsider”).

8. On July 23, 2025, Plaintiff filed its *First Amended Complaint for Avoidance and Recovery of Transfers Pursuant to 11 U.S.C. §§ 105, 544, 548, and 550, and Del. Code. Ann. Tit. 6, §§ 1304 and 1305, and for Disallowance or Subordination of Claim Pursuant to 11 U.S.C. §§ 502 and 510* (the “Amended Complaint”) [Adv. D.I. 38] against Manifold Markets, Manifold for Charity, Inc. (“Manifold for Charity” and together with Manifold Markets, “Manifold”), Ross

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<sup>2</sup> Pursuant to the *Order Granting the FTX Recovery Trust’s Omnibus Motion to Substitute Plaintiffs in Adversary Proceedings* [D.I. 29554] and the *Notice of Substitution of Plaintiff* [Adv. D.I. 12], the FTX Recovery Trust is now the proper plaintiff and has been substituted in for debtors FTX Trading Ltd., Alameda Research Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. that initially filed this action.

Rheingans-Yoo (collectively, the “Defendants” and together with the Plaintiff, the “Parties”), and FTX Philanthropy, Inc.

9. On July 25, 2025, a *Summons and Notice of Pretrial Conference in an Adversary Proceeding* (the “Second Summons”) was issued in connection with the Amended Complaint [Adv. D.I. 39].

10. On July 28, 2025, Plaintiff caused the Amended Complaint, Second Summons, and *Notice of Dispute Resolution Alternatives* to be served on Defendant Manifold for Charity [Adv. D.I. 39].

11. The deadline for Defendant Manifold Markets to respond to the Amended Complaint is currently set for August 5, 2025, and the deadline for Defendant Manifold for Charity to respond to the Amended Complaint is currently set for August 25, 2025 (the “Amended Complaint Response Deadlines”).

12. Defendant Rheingans-Yoo’s deadline to respond to the Motion to Reconsider is August 6, 2025 at 4:00 p.m. (ET) (the “Motion Response Deadline”).

13. Pursuant to rule 7004-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware, Plaintiff noticed a pretrial conference (the “Second Pretrial Conference”) for September 11, 2025 at 1:00 p.m. (ET) in the above-captioned adversary proceeding.

14. Counsel for Defendant Rheingans-Yoo has agreed to accept service of the Amended Complaint on Rheingans-Yoo’s behalf.

15. The Parties have conferred and agree to extend the Amended Complaint Response Deadlines and the Motion Response Deadline to and including September 15, 2025 and to adjourn the Second Pretrial Conference *sine die*.

16. The Parties' stipulation is attached as **Exhibit A** to the proposed form of order approving the stipulation, which is attached hereto as **Exhibit 1** (the "Order").

17. Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Order at its earliest convenience.

Dated: August 5, 2025  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

Adam G. Landis (No. 3407)  
Richard S. Cobb (No. 3157)  
Matthew B. McGuire (No. 4366)  
Howard W. Robertson, IV (No. 6903)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
cobb@lrclaw.com  
mcguire@lrclaw.com  
robertson@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Stephanie G. Wheeler (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Justin J. DeCamp (admitted *pro hac vice*)  
Christopher J. Dunne (admitted *pro hac vice*)  
Jacob M. Croke (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: wheelers@sullcrom.com  
gluecksteinb@sullcrom.com  
decampj@sullcrom.com  
dunnec@sullcrom.com  
crokej@sullcrom.com

*Counsel for the FTX Recovery Trust*